

1 REMARKS

2 Status of the Claims

3 Claims 2, 4, 5, 21-28, 33, 43, 44, 55, 88, and 89 are pending in the present application, Claims  
4 1, 3, 12, 13, 16, 42, 45-54, 62-73, 75, 79-87, 90-96 and 99-100 having been previously canceled, and  
5 Claims 6-11, 14, 15, 17-19, 29-32, 34-41, 56-61, and 97 having been canceled herein. Claims 2, 21,  
6 24, 33, 43 and 55 have been amended to more clearly distinguish the recited subject matter over the  
7 cited art. Claim 89 has been amended to correct a typographical error. This amendment does not  
8 change the scope of the claim.

9 Amendment to the Specification

10 Numerous grammatical errors have been identified and corrected in the specification. No new  
11 matter has been added.

12 Allowable Subject Matter

13 Claims 88 and 89 are allowed.

14 Patentability of Dependent Claims 24, 25, 43, and 44

15 Applicant has amended dependent Claims 24, 25, 43, and 44 to depend from allowed  
16 Claim 88. Such claims are patentable for at least the same reasons as Claim 88.

17 Claims Rejected under 35 U.S.C. § 112

18 Claims 2-10, 14-15, 17-41, 43-44, 57-61, and 97 have been rejected under 35 U.S.C. § 112,  
19 first paragraph, for failing to comply with the written description requirement.

20 This rejection encompasses independent Claims 2, 57, and 97.

21 Independent Claim 2 has been substantially amended, and the language triggering this  
22 rejection has been canceled.

23 Independent Claims 57 and 97 have been canceled herein.

24 Accordingly, the rejection is moot, and should be withdrawn.

25 Claims Rejected under 35 U.S.C. § 103(a)

26 Claims 2, 7, 8-10, 14, 15, 17-28, 31, 34-37, 43-44, 55-58, and 60 have been rejected under  
27 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 4,134,218 (Adams) in view of U.S. Patent  
28 Publication No. 2003/0051561 (Weiss).

29 Applicant has significantly amended the claims, which as amended, distinguish over the art  
30 for at least the following reasons.

1 In the interest of reducing the complexity of the issues for the Examiner to consider in this  
2 response, the following discussion focuses on independent Claims 2 and 55.

3 The patentability of each remaining dependent claim is not necessarily separately addressed in  
4 detail. However, applicant's decision not to discuss the differences between the cited art and each  
5 dependent claim should not be considered as an admission that applicant concurs with the Examiner's  
6 conclusion that these dependent claims are not patentable over the disclosure in the cited references.  
7 Similarly, applicant's decision not to discuss differences between the prior art and every claim  
8 element, or every comment made by the Examiner, should not be considered as an admission that  
9 applicant concurs with the Examiner's interpretation and assertions regarding those claims. Indeed,  
10 applicant believes that all of the dependent claims patentably distinguish over the references cited. In  
11 any event, a specific traverse of the rejection of each dependent claim is not required, since  
12 dependent claims are patentable for at least the same reasons as the independent claims from which  
13 the dependent claims ultimately depend.

14 Patentability of Independent Claim 2

15 Applicant has amended independent Claim 2 to incorporate elements from Claims 19, 31 and  
16 32, which relates to the embodiment disclosed in the last paragraph of page 74 of the specification as  
17 filed, and which is illustrated in FIGURE 22C. A training simulator includes a conductive  
18 elastomeric circuit, which enables data to be transmitted while maintaining a very realistic simulator  
19 (the conductive elastomers can be more readily made unobtrusive than conventional electrical wires).  
20 The conductive elastomeric circuit is coupled to a chemical sensor that detects a chemical change in  
21 the training simulator. For example, during a simulated procedure an injection must be given at a  
22 proper anatomical location. If successfully performed, the sensor will detect the chemical. If not,  
23 then the sensor will not detect the chemical. A simulated physiological response, such as a change in  
24 a simulated heartbeat, is implemented if the injection is successful.

25 The cited art does not appear to teach or suggest an equivalent. The chemical sensor has been  
26 previously recited, and the Examiner has appeared to assert that a chemical sensor is equivalent to a  
27 pressure sensor as disclosed by Adams (specifically noting that such a substitution is proper per  
28 MPEP 2143).

29 Respectfully, pressure sensors and chemical sensors are not equivalent. Further, it is not at all  
30 apparent why an artisan of ordinary skill would modify Adam's breast model to include a chemical

1 sensor coupled to a controller and physiological control element to simulate a physiological response  
2 due to the chemical sensor detecting a chemical. Such a modification has nothing to do with  
3 improving a model used to train clinicians to perform breast exams.

4 Accordingly, the rejection of independent Claim 2 under 35 U.S.C. § 103(a) should be  
5 withdrawn.

6 Since dependent claims inherently include all of the recitation of the independent claims from  
7 which they ultimately depend, remaining dependent Claims 4, 5, 26, 27, 28, and 33 are patentable for  
8 at least the same reasons as independent Claim 2.

9 Patentability of Independent Claim 55

10 Applicant has amended independent Claim 55 to similarly recite a conductive elastomer  
11 evaluation circuit coupled to a chemical sensor.

12 As noted above, pressure sensors and chemical sensors are not equivalent; nor is it apparent  
13 why an artisan of ordinary skill would modify Adam's breast model to include a chemical sensor.  
14 Such a modification does not appear to have anything to do with improving a model used to train  
15 clinicians to perform breast exams.

16 Accordingly, the rejection of independent Claim 55 under 35 U.S.C. § 103(a) should be  
17 withdrawn.

18 Conclusion

19 In consideration of the amendment to the claims and the Remarks set forth above, it is  
20 applicant's position that all claims in the current application are patentable over the art of record.  
21 The Examiner is thus requested to pass this case to issue without further delay. In the event that any  
22 other issues remain, the Examiner is invited to telephone applicant's attorney at the number listed  
23 below.

24 Respectfully submitted,

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